 APPENDIX N		
NATIONAL REGISTER OF HISTORIC PLACES		
 EVALUATION/RETURN SHEET		

## UNITED STATES DEPARTMENT OF THE INTERIOR NATIONAL PARK SERVICE

NATIONAL REGISTER OF HISTORIC PLACES EVALUATION/RETURN SHEET

REQUESTED ACTION:	NOMINATI	ON	•					
PROPERTY Gregory NAME:	Mountain	(Chokia)						
MULTIPLE NAME:			•					
STATE & COUNTY: C.	ALIFORNIA	., San Diego						
DATE RECEIVED: DATE OF 16TH DAY: DATE OF WEEKLY LIS	1/25/0 2/28/0 T:	06 DATE 06 DATE		PENDING LIST: 45TH DAY:	2/13/06 3/10/06			
REFERENCE NUMBER: 06000106								
REASONS FOR REVIEW	T:							
APPEAL: N DATA FOTHER: N PDIL: REQUEST: N SAMPLE	,	N LANDSCAPE: N PERIOD: N SLR DRAFT:	N	PROGRAM UNAPPR	EARS: N OVED: N N			
COMMENT WAIVER: N	ī							
ACCEPTRE	TURN	REJECT		DATE				
ABSTRACT/SUMMARY	COMMENTS:							
	RETURN							

## SEE ATTACHED COMMENTS

RECOM./CRITERIA PETURA								
REVIEWER + 21 R LUSIGNAD DISCIPLINE + ISTORIAN	_							
TELEPHONE 202.354.2229 DATE 3/10/06								
DOCUMENTATION see attached comments Y/N see attached SLR Y/N								
If a nomination is returned to the nominating authority, the nomination is no longer under consideration by the NPS.	2							

# GREGORY MOUNTAIN San Diego County, California

### National Register of Historic Places - Review Comments:

The current documentation is being returned so that substantive and technical issues can be addressed. The items noted below reflect a preliminary review of the nomination documentation.

Federal Certification/Ownership

The current nomination cites the Bureau of Indian Affairs (BIA) as an owner/administrator for certain lands within the bounds of the nominated property. If this is the case, then the nomination must follow the procedures for a "Concurrent State and Federal Nomination," (36 CFR 60.10) and must be submitted to the agency's Federal Preservation Officer for review, comment, and nomination. Mere notification of the regional office of the BIA is insufficient.

Can the State verify that notification was provided to all of the owners of record? An issue has been raised regarding whether or not the notification requirements of 36 CFR Part 60 have been fully met [GCL January 30, 2006 petition, pp.8-9]. Any resubmission should contain information regarding the current owners.

**Classification** 

The Resource Count lists six (6) contributing sites. The narrative description, however, fails to identify these contributing features or their location within the nominated property. While the Medicine Rock rock art site and the mountain in its entirety are assumed to represent two of the resources, the others also need to be identified. The narrative should also discuss how and why these particular individual features were selected for specific notation.

The materials accompanying the nomination refer in several places to registered archeological sites within the general vicinity of the Gregory Mountain site. It is unclear which, if any, of these sites are contained within the bounds of the currently nominated property, what they represent, or what connection they may have to the historic or prehistoric significance of the nominated property. The discussion of the environmental review for the landfill project notes 15 archeological and one cultural site located with the project area. No identification is provided to describe what that project area encompassed or what part of the nominated property might be included? The discussion also noted that the general area included "six significant historic archeological resources that are eligible for inclusion in the California Register of Historic Resources." What are they? Are these the 6 sites listed in the resource count? Do these sites reveal a native association with the locale? Does this relate to the TCP significance, or what does it say of the region surrounding Gregory Mountain in general?

Description

The Section 7 description narrative should generally be reserved for a clear discussion of the physical character of the nominated resource. For a Traditional Cultural Property this would

include not only its contemporary physical appearance, but also the way it is described in the relevant traditional practices or beliefs. The current narrative, however, combines elements of a physical description with considerable background history, a discussion of broad associative values and other detailed elements that are normally best reserved for placement in a Statement of Significance under Section 8. The jumble of materials related to significance/religious beliefs/ceremonies that is provided here makes understanding the extent of the physical landscape more difficult than necessary. The narrative could be strengthened by compartmentalizing the physical description and the discussion of associative values and placing the broader discussion of cultural practices within Section 8.

Are there additional elements or characteristics of the Gregory Mountain landscape that retain special importance or associations relative to Native American beliefs or traditional practices. For instance the nomination makes reference to the dominant plant species found on the mountain (7.1) and later to the value of the mountain as a source of plant gathering (8.12), but there is very little discussion linking the physical description to the traditional activities. This does not mean that specific use locations or ceremonial activities must be revealed by the informants, but the nomination would be strengthened by a stronger discussion of the physical attributes of the Mountain that contribute to its value in the eyes of the traditional Native American users. (Why is Gregory Mountain a vital location for conducting important cultural activities and not just any place offering similar quiet, contemplative conditions?)

Throughout the narrative the discussion makes significant use of Native American "informants" to cite the values and associations connected to Gregory Mountain. The use of such ethnographic resources could be greatly strengthened by introducing a brief discussion regarding how these people were identified and from what perspective they provided the important ethnographic data presented here. (Do they represent tribal elders, holders of traditional tribal knowledge, speaking from personal experiences, collective tribal views, political perspectives, etc.) Similarly, as discussed later, the ethnographic narratives could provide a stronger link between current activities and "historic" traditional practices by better discussing the time depth of these cultural practices. How long have they been occurring? Were traditional practices and knowledge passed down from generation to generation within families? Among certain groups? Does the contemporary knowledge of traditional practices derive from oral traditions and stories passed down from previous generations or first-hand recollections of past usage? The nomination could do a better job of linking the ethnographic (Harrington) record with contemporary practices, focusing less on the "revival" of traditional practices and more on the continuity of the values and beliefs associated with this special place.

The narrative is inconsistent in the spelling of the spiritual being Taakwic from cover page to the text and within the text. (The cover page lists "Takwish," but the first citation in the narrative uses "Taakwic.")

#### Significance

A considerable amount of the narrative currently found in Section 7 relating to Native America/Luiseno beliefs and cosmology would be better placed in Section 8 as it relates to the broad patterns of history associated with the Luiseno people and the Gregory Mountain site.

Ordered perhaps by group, the placement of these materials under Significance would free up the description section to relate more information highlighting the links between those cultural beliefs and practices and the physical landscape that is the nominated mountain.

Pages 7.2-7.6 for instance provide considerable background information on Wiyot, Taakwic, and other aspects of broad Luiseno cultural practices, but very little of this discussion is tied to the physical landscape except for a brief mention of Medicine Rock. Likewise, the narrative provides considerable background information regarding the Chingichnish religion, yet the connection between the physical resources of Gregory Mountain and these religious practices or beliefs is rather limited, unless they are tied to the traditional ceremonies described elsewhere throughout the document. While this might be assumed, the linkages examining how these religious beliefs are tied to the mountain are rather weak.

Moving the bulk of this discussion now found in Section 7 to the Statement of Significance would allow the description to better focus on relating the physical resources to the significant historical themes.

Though not required, a brief outline of the traditional history of the Luiseno people/Pala Indian Reservation in the San Diego County/Gregory Mountain region, could be useful for establishing the larger context of Ethnic (Native American) history. This might include a discussion of the relationship of the Luiseno to the broader southern California Shoshoneans, since a considerable portion of the narrative cites these other related groups and certain shared beliefs. [This is not dissimilar from the inclusion a brief outline of particular Euro-American settlement patterns for a site associated with German or Irish ethnic heritage.]

#### Criterion B

Given the numerous other sightings of Taakwic over a widely dispersed area of southern California and Mexico, the question arises as to the specific associations between this site and Taakwic. If Gregory Mountain merely exists as one of many places Taakwic rested, how is this sufficient to meet the necessary associative values required under Criterion B. The nomination should either develop stronger links tying Taakwic to special associations with this particular site or fold the evaluation narrative into Criterion A.

The current narrative provides extensive documentation outlining the cultural importance of the spiritual being known as Taakwic to the Luiseno people and their traditional world view. The documentation is weaker, however, in establishing why Taakwic's connection to Gregory Mountain is so important to the Luiseno band. If Taakwic is seen everywhere, how important is Chokla (one of his many resting spots) to the spiritual continuity of the Native American community? Does his association make Gregory Mountain a special place or conduit for meeting with him and/or gaining power? Or can this be achieved in any of the areas where he was known to have revealed himself? Is Gregory Mountain considered the only way to communicate with him and gain power, the best way, the particular venue for certain people? Does this area have a special/different use for shamans? Ordinary residents?

If Tahquitz Peak/Lily Rock is considered such an important location associated with the spiritual

being Taakwic for regional tribes, why is Chokla then worthy of special recognition? Under Criterion B, the National Register normally requires a comparison among the various associated sites to identify those with the best associations. Wouldn't the strongest association be found in Taakwic's "home" at Tahquitz Peak, rather than one of many resting spots associated with him? The current discussion works well under Criterion A, but Criterion B is less well justified since mere association is normally not sufficient under the Criteria.

"Several Luiseno recognize the mountain as extremely important for other religious and cultural reasons." [8.12] Is this isolated to a few individuals or reflective of a true group/community shared value? As noted previously, the nomination could be stronger if the informants were better identified? Who do they speak for? How were they identified as those who would have knowledge regarding the TCP/Gregory Mountain? Are they traditional spokespersons for the tribe, or political spokespersons? When evaluating traditional cultural properties there can be a substantial difference between testimony provided by a few isolated individuals and a community-wide perspective or consensus presented by recognized spokespersons. A key element to documenting and justifying a TCP, particularly in the face of uncertain opposition, is the ability to verify the importance of the property to a living "community" and not just isolated individuals.

#### Criteria C and D

The current documentation does not support the eligibility of Gregory Mountain under Criterion C or D. However, with additional supporting materials the case for the significance of the Medicine Rock feature (and other as yet un-identified rock art features on the mountain) could probably be made quite easily under these criteria. [The documentation for such a case is not considered necessary for the evaluation of the larger Gregory Mountain resource.]

#### Integrity

The nomination does not extensively document integrity in relation to the ongoing uses of mountain and surrounding areas for non-ceremonial activities (utilities, mining, gravel quarrying, dairy, resort, etc.) The nomination could use a stronger justification for not only why areas outside were left out, but what was included in the nominated boundaries despite modern uses.

#### Geographical Data

#### **Verbal Boundary Description**

The verbal boundary description should be as precise as possible, even when dealing with such large land areas. The current description could be tightened up, particularly in reference to fixed geographical or topographical features, to better allow reconstruction of the precise limits of the nominated area. The use of irregular boundaries in connection with a USGS map can often lead to difficulty in identifying precise boundaries for individual property parcels/owners.

Many of the boundaries shown on the ownership parcel map appear to be precisely drawn, but the narrative does not always reveal the basis for the specific delineation. For example: The northern boundary is given as the "southern bank of the San Luis Rey River flood plain." Unless this is a recognized delineation visible on specific maps, it might be better to reference a certain contour line visible on the USGS maps. "The northern extent is bounded by the southern bank of the San Luis Rey River flood plain, which coincides approximately with the 400 foot contour visible on the USGS map," or "...which coincides with an unpaved roadway marked upon the USGS map."

Continuing "... The western boundary follows the bottom of the mountain slope along the floor of Gregory Canyon from the point where the 400' contour line meets the blue line stream to the top of Gregory Canyon, where the western boundary continues along a dirt road to the Southwest corner."

The use of the section line for the southern boundary is fine except that it does not define the far southwestern corner and the irregular boundary found there. The verbal boundary justification notes that the southwestern corner follows the limits of the legal parcel line. This material should be provided in the description narrative (move the first two lines of paragraph 4 from the justification to the description). Likewise, the use of Lilac Road on the east provides a recognizable fixed delineation line for most of the eastern boundary. What is not so clear is the path and justification used for the bounds once they leave the roadway on parcels 1101801200 & 1101802000. The line appears rather precisely drawn but no basis for the specific path is provided. (Why not follow the valley floor and blue line stream on this side of the mountain up to the flood plain/400' contour in the same manner as outlined for the western boundary?) The current boundary appears to take a very deliberate path between two topographical features on the east side of the stream valley, but the precise justification or path is unclear.

#### Verbal Boundary Justification

The verbal boundary justification could be strengthened by elaborating on the Native American perspective on why the mountain in its entirety should be considered as the significant resource. While the Native American perspective should clearly be a guiding factor, it should be supported by statements explaining the basis for such determinations. (Is it based on the ceremonial use of areas across the mountain? The obvious nature of the distinctive land form in the context of its surroundings? A long-standing belief in the relationship between spiritual powers and land forms?

If you have questions regarding these comments, please contact me directly at the number listed below.

Paul R. Lusignan, Historian

(for) Keeper of the National Register

(202) 354-2229

<u>3/10/06</u> Date

A:\gregorymountain.rtn